



Kenya Key Rachal
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
100 Vision Drive
Suite 400
Jackson, Mississippi 39211
March 5, 2018

Re: Notice of Non-Compliance Re Paragraph 11.1 2nd Modified Mississippi
Settlement Agreement and Reform Plan and Stipulated Third Remedial Order

Olivia Y v. et al. v. Phil Bryant as Governor Case No. 3:04CV251LNIU

SENT VIA E-MAIL

Dear Kenya:

Pursuant to Paragraph 11.1 of the 2nd Modified Mississippi Settlement Agreement and Reform Plan, and Paragraph 10 of the Stipulated Third Remedial Order ("STRO") Plaintiffs inform you of their intention to file a Motion with the Court to enforce their rights pursuant to Defendants' violation of paragraphs 5d and 10, of the STRO.

Specifically, Defendants are in violation of their agreement that by December 31, 2017, 90% of state workers will meet the caseload performance target of 90%. (STRO paragraph 5(d)). As verified by Public Catalyst, the underlying caseload data establishes that as of December 31, 2017, only 61% of workers met the required caseload standard.

Very truly yours,

/s/

Marcia Robinson Lowry
Executive Director
A Better Childhood, Inc.
Counsel for Plaintiff Children

Attachment

**A BETTER
CHILDHOOD**

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